



# Commercial Services Plan 2003 Mount Rainier National Park

# A Message from the Superintendent

How should we manage commercial services in Mount Rainier National Park? What kinds of businesses are necessary and/or appropriate within the park? At what levels should these businesses operate? This Commercial Services Plan and accompanying Environmental Assessment are intended to answer those questions. The alternatives in this plan, presented separately, offer a wide range of options for managing guided climbing, guided wilderness, guided alpine wilderness, and additional services such as day hiking and road-based tours.

Your input at public scoping meetings held in spring, 2002 provided us with much needed feedback on the way we ought to manage commercial services. In this stage of the planning process, we ask for your comments once again. Your thoughts and concerns are important. We appreciate your taking time to review the plan and tell us what you think.

David V. Uberuaga Superintendent, Mount Rainier National Park

# **Mount Rainier National Park Legislative Purpose**

Congress established Mount Rainier National Park on March 2nd,1899. The park's enabling legislation, legislation which established the National Park Service, subsequent laws, executive orders, and policy directives, call for Mount Rainier National Park to be managed:

- To protect and preserve its natural and cultural resources, processes, and values, while recognizing their increasing importance in the region, the nation, and the world
- To provide opportunities for visitors to experience and understand the park environment without impairing its resources to maintain wilderness values
- To provide for wilderness experiences

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# Why A Commercial Services Plan?

National parks are special places, saved by the American people so that all may experience our heritage. Parks like Mount Rainier help preserve our collective identity and are a source of great national pride. The Commercial Services Plan for Mount Rainier is one way of protecting the park. Park staff must manage commercial services so that natural and cultural resources remain unimpaired today—and forever.

The national parks movement of the mid- nineteenth century was fueled by a determination to save beautiful and historic spots in America, in part to keep them from being covered with hotels, curio shops, and amusements. Over- commercialization and development can spoil the very character of the places visitors come to see. Yet some kinds of commercial activities are appropriate in national parks (and sometimes necessary, too). They help visitors enjoy natural and cultural wonders to which they might not otherwise have access. Often commercial operators help protect. A wilderness guide, for example, may be the first person who talks to a client about environmental ethics.

Through the public planning process, the National Park Service hopes to find the most effective and efficient way to manage commercial activities to protect resources, values, and the quality of visitor experiences. After holding public meetings and gathering comments, the Commercial Services Planning Team created this document, which describing a number of different alternatives. Once again, you have an opportunity to voice your perspectives on the plan before a final decision is made.

The alternatives ultimately selected will serve as a comprehensive guide for managing Mount Rainier's commercial services over the next five to 10 years. They will establish guidelines for identifying, regulating and minimizing the effects of commercial services on park resources. These guidelines will be consistent with the General Management Plan, the park's mission, goals, policies, management documents, and associated laws.

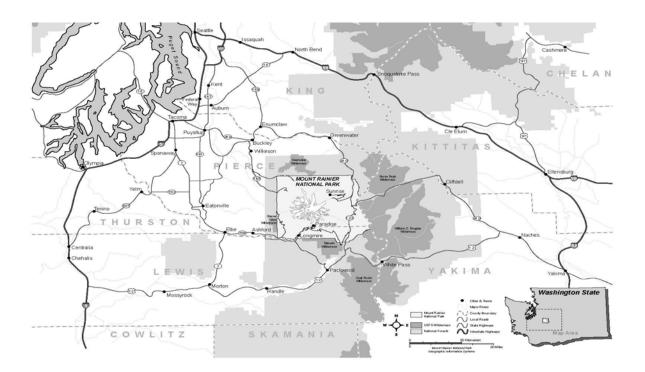
# **A Dynamic Plan**

To be useful, the Commercial Services Plan must be flexible. To protect park resources and the quality of the visitor experience, changes might be made to the selected alternative after the plan is finalized. Party size limits, route and trail use, seasonal use dates, and other specifications may be revised in response to new information, such as visitor carrying capacity studies. Approved activities, if found incompatible with resource protection, visitor enjoyment, and/or safety, may be suspended or terminated.

# **Park Setting**

# **A Regional Perspective**

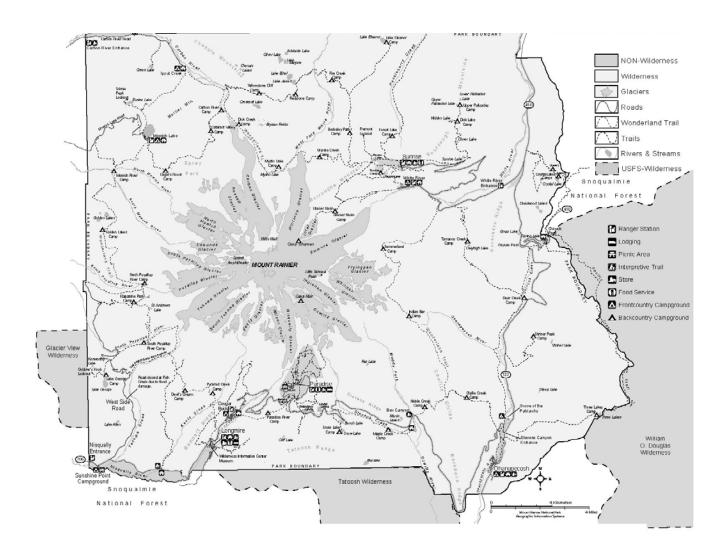
Mount Rainier National Park lies just west of the Cascade Mountain Range in the southwestern part of Washington. Stretching over 235,625 acres, the park is approximately sixty- five miles southeast of the Seattle-Tacoma metropolitan areas and sixty- five miles west of Yakima. Eighty three percent (196,181 acres) of the park lies in Pierce County and 17 percent (39,444 acres) is in Lewis County. In the heart of the park is the mountain itself, which towers above the surrounding Cascade summits and dominates the Puget Sound landscape.



# **A Local Perspective**

A visitor to Mount Rainier National Park enters a world of dense old- growth forests, dazzling wildflower meadows, tremendous snowfields, and rugged glaciers. Elevations in the park range from about 1,410 feet above sea level at the Tahoma Woods Administrative Site to 14,410 feet at the summit of Mount Rainier.

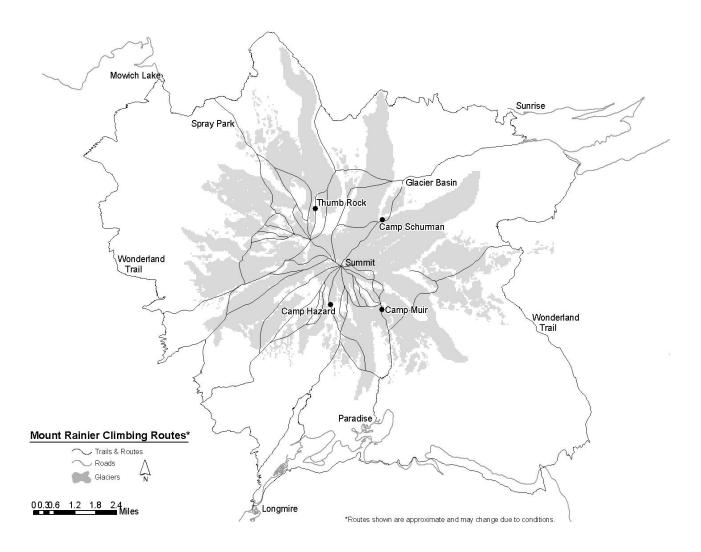
Below the summit, steep glaciated valleys and ice- carved peaks dominate the landscape. The Carbon, Mowich, White, Nisqually, South Puyallup, and North Puyallup rivers and their tributaries carry water from Mount Rainier to the Puget Sound. The Ohanapecosh flows into the Cowlitz River before exiting the park on its way to the Columbia River.



# **Climbing Routes**

Mount Rainier is an active volcano which covers an area of about 100 square miles. Twenty- six major glaciers flank the upper mountain, stretching over 35 square miles. As the most heavily glaciated peak in the lower 48 states, it offers world class climbing opportunities. The mountain has also been the primary training ground for many climbers who attempting tougher endurance climbs like Mount McKinley and Everest.

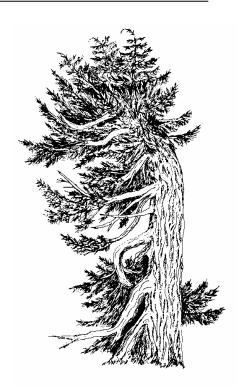
For more than 80 years, commercial guiding has enabled many to climb to its summit. In 2001, 11,688 people participated in some kind of climbing activity, and of those, 4,165 (36%) were commercially guided.



# **Natural Resources**

# **Vegetation**

The park boasts extensive stands of old- growth forests and a diverse assemblage of rare and endangered wildlife and plant species. Park vegetation is diverse, encompassing three ecological zones. Above tree line around 6,000 feet and comprising approximately 19 percent of the park is the alpine zone. It generally consists of snow, ice, rock and fragile alpine plants. From about 5,000 feet to tree line is the subalpine zone. It covers about 23 percent of the park and is characterized by scattered stands of subalpine fir, heather and meadows. Below it is the forest zone, occupying about 58 percent of the park. It is dominated by western hemlock, silver fir, Douglas- fir, western red cedar and other species.



#### Wildlife

The ecological zones within Mount Rainier National Park provide habitat for a multitude of wildlife, from black- tailed deer and elk to mountain goats and cougars. The park contains a number of species that are listed as threatened, endangered, sensitive, or of concern, either by the federal or state government. Northern spotted owl, bald eagle, Chinook salmon, marbled murrelet, and bull trout are examples of listed species that have been observed recently. Canadian lynx, wolverine, and Pacific fisher were once observed in the area, but are thought to have disappeared. A number of species have almost certainly been extirpated from the park, including gray wolves and grizzly bears.

#### Wilderness

In 1988, Congress designated approximately 97 percent (228,480 acres) of Mount Rainier National Park as wilderness. Park wilderness includes a wide array of undisturbed lands encompassing ancient rainforest, pristine rivers and subalpine meadows. Wilderness designation emphasizes the natural, ecological, geological, cultural, scenic, and scientific value of resources, and the value of recreational opportunities. Solitude, natural quiet and natural darkness are also recognized. In the park, the wilderness boundary is generally 200 feet from the centerline of paved roads and 100 feet from unpaved roads.

#### Water

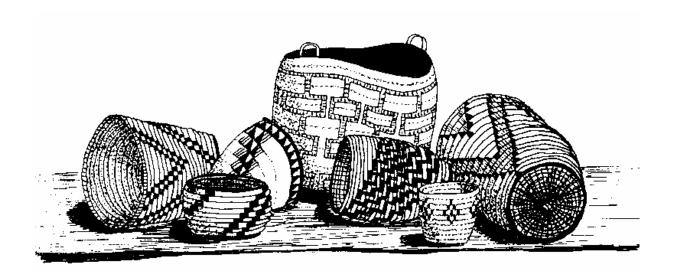
Mount Rainier is "the place where the rivers begin" in the Puget Sound. Park water resources are diverse and include glaciers, snowfields, alpine lakes, waterfalls, rivers and mineral springs. Nine major rivers as well as numerous significant creeks flank the mountain. Lakes, ponds, streams, geothermal springs, and wetlands are among the many water resources of Mount Rainier National Park.

## **Air Quality**

Not all of Mount Rainier National Park's resources are immediately visible. Under the Clean Air Act (1977), the park is in a mandatory Class I area and is afforded the highest degree of protection. This designation allows very little additional deterioration of air quality. Park managers have a responsibility to protect park air quality from pollution, and must consider the impact of pollution on visibility (scenic vistas), plants, animals, soils, water quality, cultural resources and visitor health.



# **Cultural Resources**



In addition to its natural wonders, Mount Rainier National Park has rich, diverse cultural resources that include prehistoric and historic archeological sites, historic structures, and cultural landscapes. Native Americans used many areas which are now within the park for hunting, gathering, spiritual, and ceremonial purposes. Some traditional use of the park continues today.

In the late 19<sup>th</sup> century, miners, climbers, and tourists began to come to Mount Rainier. The establishment and development of the park constitutes an important chapter in the evolution of the American park idea. Most developed areas of the park have been designated as part of Mount Rainier National Historic Landmark District.

# **Archeology**

Only a small percentage of the park has been surveyed for archeological resources. The most intensive survey efforts in the last 10 years have been associated with rehabilitation and construction projects in the developed areas of the park, including trails and backcountry camps. Less intensive reconnaissance efforts have focused on subalpine and alpine landscapes, as well as forest settings. Other survey efforts have concentrated in areas where known archeological resources have been reported.

# **Ethnography**

For thousands of years, Mount Rainier has been an important place and a symbolic landmark for Native Americans. In addition to ancestral use for hunting, archeological and ethnographic evidence suggests that prehistoric people used high elevation landscapes on Mount Rainier to gather a variety of economically important resources. The gathering of beargrass and cedar splits for basketry and plants for medicinal, ceremonial and religious uses has been documented through 1950 (Boxberger 1998). Similar uses continue today.

### **Historic Structures and Cultural Landscapes**



There are approximately 156 historic resources in the park individually and collectively listed on the National Register of Historic Places. Many more sites, structures and objects are potentially eligible for the National Register. In addition, there are five National Historic Landmark buildings or building complexes that have been designated in the park. Each is an outstanding example of rustic architecture. Many were used as models for similar structures in other National Parks.

The Mount Rainier National Historic Landmark District was designated in 1997. This large and exceptional district, now on the National Register of Historic Places, contains 97 historic buildings and 60 historic structures. It includes most of the park's road system, the Wonderland and Northern Loop trails, as well as 31 other listed features. Together these resources make up one of the best examples of park master planning in the National Park System.

# **Visitation and Use**



A Ranger and visitors overlooking the Mountain from Sunrise, 1929 / is1183

Mount Rainier National Park is one of the most popular visitor attractions in the Pacific Northwest. Visitation to Mount Rainier National Park, with some exceptions, increased at a steady rate until it peaked in the early 1970's. Over the last 10 years, visitation has averaged about two million visitors annually. Seventy- five percent of those visitors come between June and September. Peak visitor months are July and August.

Located an hour and a half from metropolitan Puget Sound, Mount Rainier is within easy reach. Visitation is highly dependent on the weather, with the most visits occurring on sunny summer weekends. During winter months, visitation decreases substantially, although the Paradise parking lot still fills to capacity on sunny winter weekends. Most visitors are day- users and do not camp in the park overnight.

# **History of Commercial Services at Mount Rainier**

- 1900 The Longmires, a pioneer family, develop the Longmire Springs area and build a guesthouse, barn, storehouse, and numerous bathhouses.
- John Reese opens a "tent hotel" above Paradise Valley. He charges guests \$10 for a week's basic accommodations. Guides are furnished at extra expense.
- The Longmire family faces competition when the Tacoma Eastern Railroad is granted a lease to build a new hotel, the National Park Inn, adjacent to the Longmire's private property. Robert Longmire opens a saloon, which is quickly closed by the park's Superintendent.
- Roy Longmire is granted permission to operate an "automobile for hire" in the Longmire Springs area. Automobile traffic within the park increases.
- The Rainier National Park Company (RNPC) is formed by Puget Sound businessmen in March and is granted a 20- year "preferential concessions lease" by the newly established National Park Service. Construction of the Paradise Inn begins in the summer.
- The RNPC allows an exception to their commercial control by allowing an automobile service station to be constructed in the Longmire Springs area by the Standard Oil Company.
- A caravan of 300 cars containing the press and public officials makes the drive up the newly constructed road to Yakima Park, now known as Sunrise. The lodge, rental cabins and other buildings are still under construction. It is hoped that with some planning the site will help reduce over- crowding at Longmire and Paradise.
- Paradise becomes the winter playground of the northwest. The first annual Silver Skis Championship brings nationwide attention to Mount Rainier winter sports. The community building and kitchen are open for those who cannot afford the RNPC facilities.
- The National Park Service purchases all 18.2 acres of the Longmire property for \$30,000. Construction begins on a new ski lodge at Paradise.
- Financially distressed, the RNPC sells their rental cabins at Paradise and Sunrise. The cabins are moved out of the park and used for emergency employee housing.

- 1950 A third ski area opens at Canyon Rim. RNPC provides lunch service, car chain rental, and ski equipment rental at Longmire.
- 1951 Lou and Jim Whittaker begin guiding on the mountain.
- The Paradise Visitor Center (later renamed the Henry M. Jackson Visitor Center) opens in September, and includes a gift shop and food service.
- Rainier Mountaineering, Incorporated (RMI), started by Lou Whittaker and Jerry Lynch, begins commercial operations.
- The RNPC sells its concessions interest to Government Services, Incorporated (later Guest Services, Incorporated).
- After operating under a series of permits, Rainier Mountaineering, Incorporated (RMI) gets its first five- year guide service concessions contract. No qualifying offers are received to operate the ski tow for the first time since the late 1920's due to several years of high snows and growing competition other nearby ski areas.
- 1976 GSI discontinues firewood sales at most campgrounds. Another vendor is permitted to provide this service.
- 1979 GSI discontinues the sale of gas at Sunrise.
- 1986 RMI becomes the first guide service and climbing school to receive American Mountain Guide Association (AMGA) accreditation.
- 1987 Guest Services, Incorporated is awarded a 25- year contract.
- 1993 Standard Oil discontinues the sale of gasoline at Longmire. Transportation Feasibility studies begin.
- Following significant controversy, the historic Sunrise Lodge is proposed for demolition and replacement because of its deteriorating structural condition.
- Passage of the Park Service Concessions Management Improvement Act (PL 105-391). The Superintendent issues a moratorium on new Incidental Business Permits beginning March 25<sup>th</sup>; no new IBPs can be awarded and current levels are frozen.
- Mount Rainier National Park celebrates its 100<sup>th</sup> Anniversary on March 2<sup>nd</sup>.
- **2002** The General Management Plan is completed and will guide management decisions over the next 20 years. Public scoping begins for this CSP.

# **Commercial Services at Mount Rainier**

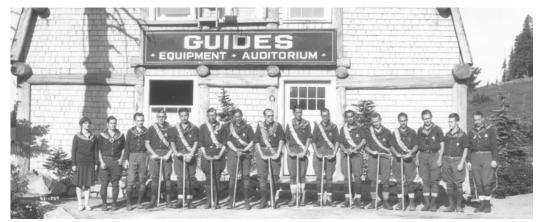


Dining Car, circa 1920s / twc2019

Mount Rainier National Park authorizes commercial activities in a number of different ways, including concession contracts, special use permits, and incidental business permits. It will authorize commercial use authorizations when they replace incidental business permits (see box "IBPs Will Become CUAs" later in this section).

# **Are Non-Profit Organizations Considered Commercial?**

For the purposes of CUAs, a service is generally considered commercial if the provider receives compensation (through money, travel expenses or the receipt of something that has monetary value). For the purposes of obtaining a commercial use authorization, non-profit institutions are not required to obtain commercial use authorizations *unless taxable income is derived by the institution from the authorized use.* The general exceptions to this rule are certain commercial transportation services providing no more than on-board interpretation, and bonafide educational programs offered through accredited colleges, universities, and certain other educational institutions. Note, however, that other permits may be required even if a commercial use authorization is not. Final rules for CUAs are still pending.



Climbing Guides circa 1920s / n310

#### **Concession Contracts**

A business which is awarded a contract to provide commercial services within National Park Service boundaries is called a concessioner. Before a concession contract can be granted for an activity, the National Park Service must, through a planning process, deem that activity both "necessary and appropriate" for the public use and enjoyment of the park. This use must be consistent to the highest practical degree with the preservation and conservation of the park's resources and values.

Necessary and appropriate activities often include a vital visitor service, such as lodging or food. Contracts generally *require* a business to provide certain services, whereas other types of authorizations merely *allow* businesses to provide a service.

Concession contracts are usually awarded through a competitive process. A contract term generally ranges between 5 and 20 years, depending on the terms and conditions of the contract. One of the terms might include, for example, capital improvements to land or facilities. In such a case, a concessioner has a right to be compensated.

Contracts include an operations plan, maintenance plan, risk management plan, and in many cases a building improvement program. Concessioners are assessed a franchise fee for the privilege of conducting approved commercial services as identified in a concessioner contract. The superintendent approves rates and charges for services based on comparisons within the competitive market.

The 1998 National Park Service Concessions Management Improvement Act (PL 105-391) provides a right of preference to contract renewals under certain circumstances. Outfitter and guide services and operations that have annual gross receipts of less than \$500,000 generally have a right of preference for contracts (see 36 CFR Part 51).

Three categories of concession contracts have been developed as a result of the 1998 Act.

Category I contracts are used when capital improvements are required or allowed on park lands in exchange for a Leasehold Surrender Interest for such construction. Category II contracts are used when a concessioner is assigned land or facilities, but no capital improvement are allowed. Category III contracts will be used when concessioners are not assigned land or facilities and may not install capital improvements.

#### **Current Concession Authorizations**

Currently, Mount Rainier National Park has two large concession contracts and one small concession agreement. One of the large concession contracts is with Guest Services, Incorporated (GSI). No alternative management strategies have been developed for GSI's services. Their contract expires in 2012, and therefore is not being evaluated in this plan.

**Guest Services, Incorporated** provides overnight accommodations, food services, gift shops, and equipment rental and instruction under a concession contract. GSI operates the National Park Inn at Longmire, which offers 25 rooms and is open year round. GSI also operates the Paradise Inn at Paradise, which has 117 rooms and stays open from Mid- May to early October.

Both inns offer full service restaurants. Snack bar style dining is provided at Sunrise (summer season), the Jackson Memorial Visitor Center at Paradise (year round with seasonal hours), and at the Paradise Inn (summer). Gift shops are located at the Jackson Memorial Visitor Center, Paradise Inn, and at Sunrise. Additionally, GSI operates the Longmire General Store. Firewood is sold by GSI at the Cougar Rock Campground and at the General Store. The concessioner also houses employees within the park.

Rainier Mountaineering, Incorporated (RMI) operates under a concession contract providing guide services to park visitors on Mount Rainier. RMI guides on the Muir Route and is entitled to guide on other routes as well. In addition to summit climbs, RMI offers climbing seminars, snow and ice schools, day and overnight hiking trips, avalanche seminars, and other skills courses. RMI used to be assigned space in the Guide House at Paradise, but now operates out of a privately owned facility outside the park's southwest boundary in Ashford, Washington. At Camp Muir, Rainier Mountaineering operates a wood bunkhouse for clients and guides, a kitchen with several propane tanks, and a snow melt water system. RMI is currently operating under a contract extension, which is discussed in greater detail in the section "Other Significant Planning Issues."

**Campground Firewood Sales.** John Squires currently holds a concession authorization to provide bundled firewood at Ohanapecosh and White River Campgrounds.



#### Incidental Business Permits / Commercial Use Authorizations

Incidental business permits (IBPs) are currently used for business activities that begin and end outside the park, such as some climbing services, guided wilderness providers, towing operators and shuttle buses.

Under the 1998 Act, commercial use authorizations (CUAs) will replace IBPs. They may be issued to private persons, corporations, or other business entities to provide certain services to visitors. Such commercial operations must either have annual gross receipts of not more than \$25,000 (if operations originate and are provided solely within the park, or provide services that both originate and terminate outside the park.

A cornerstone of National Park Service management is a preference for out- of- park private enterprise. It is National Park Service policy that if adequate commercial facilities are available to serve visitors outside of the park boundary, no new facilities will be developed, nor will existing facilities be expanded within parks (NPS Management Policies 2001). This helps protect the integrity of park resources, the quality of the visitor experience, and the viability of businesses in the neighboring communities. The 1998 Act created a framework for a new kind of authorization instrument called a commercial use authorization (CUA). CUAs will replace the current incidental business permits (IBPs).

#### A Moratorium on IBPs

IBP levels have not increased since 1998, due to a moratorium imposed by the superintendent. The primary reason for the moratorium was a management issue with IBPs. Prior to the 1998 Act, if a park deemed one kind of activity "appropriate" and issued a permit for it, it could not limit the number of other permits issued for the same kind of activity. The park's relative inability to limit the number of IBPs created the potential for serious impacts on resources and visitor enjoyment. This led to the moratorium.

#### When Will the Moratorium on IBPs Be Lifted?

With the 1998 Act, the park is now required to authorize only such services that it determines will have minimal impacts on the resources and values of the park. Services must be consistent with the purpose for which the park was established, with applicable management plans, park policies and regulations. The park has no authority to issue more authorizations than are consistent with the preservation and proper management of park resources and values.

The moratorium will be lifted after the commercial services planning process is complete and regulations or other directives exist for the issuance of commercial use authorizations (see below). At that time, limits imposed by the selected alternatives would go into effect.

#### **IBPs Will Become CUAs**

Regardless of the alternative selected, changes resulting from the 1998 Park Service Concessions Management Improvement Act (PL 105-391) will affect concessions authorization instruments. Incidental business permits (IBPs) will be replaced by commercial use authorizations (CUAs).

When the final alternatives are selected, those commercial services currently being conducted under IBPs which the park determines will have minimal impact on the resources and values of the park will be conducted under CUAs. The moratorium on issuing IBPs / CUAs will be lifted after the final alternatives are selected and implemented, and limits described in the selected alternatives would go into effect. If a "No Action" alternative is selected, an increased number of CUAs could be issued in each commercial service category.

#### What Will Happen When IBPs become CUAs?

Regulations relating to CUAs are still being developed, and it is difficult to predict exactly how CUAs would be administered. But according to the 1998 Act, CUAs will have a lot in common with IBPs. Just as with IBP holders, CUA holders will:

- Have a minimal impact on resources and values
- Conduct activities consistent with the purposes of the park
- Conduct activities subject to certain conditions and stipulations, such as number of participants, location, dates and times
- Have no preferential right of renewal
- Be monitored by park staff to ensure that the activities they conduct are safe, fair, and appropriate

- Pay a reasonable fee which, at a minimum, allows the park to recover management and administration costs
- Not generally be assigned land or facilities inside the park
- Not claim an exclusive right to provide services

#### **Current Incidental Business Permits**

Twenty- five businesses provide services in the park through incidental business permits (IBPs), including shuttle services, towing services, and guiding services. Their services originate and end outside the park.

Existing Incidental Business Permits (Table 1)		
Type of Service	Service Provided	Permits
Shuttles	Shuttles to, from, and in park	2
Towing	Tow and repair services in park	6
Guided climbing	Guide summit climbs on Emmons Route	4
Guided Wilderness	Guide groups overnight in the wilderness	4
Mountaineering Skills	Teach groups climbing skills (non-summit)	2
Drive-in Campground Use	Camp in group sites in drive-in campgrounds	4
Guided Day-hikes	Hike various trails	1
Bicycle tours	Bicycle tours in park	2
TOTAL		25

# **Special Use Permits**

In Mount Rainier National Park, special use permits (SUPs) are granted for activities such as non- denominational religious services in campgrounds, weddings, commercial filming, scientific research and monitoring, and commercial photography. Mount Rainier also has an SUP application for visitors climbing above 10,000 feet or on glaciers. The cost of the permit funds the Mountaineering Cost Recovery Program, providing climber safety education, administration, and human waste removal.

Just as with climbing permits, Mount Rainier National Park recovers costs incurred in administering and monitoring SUPs. The park establishes and collects additional fees as

authorized by legislation, regulations, and policies. Applicants must indemnify the United States Government and protect the public by providing certificates of insurance when required. Under certain circumstances, performance bonds may be required for permitted activities.

National Park Service Management Policies (2001) define a special park use as a short term activity that takes place in a park area, and:

- Provides a benefit to an individual, group, or organization rather than the public at large
- Requires written authorization and some degree of management control from the National Park Service to protect park resources and the public interest
- Is not prohibited by law or regulation
- Is not initiated, sponsored, or conducted by the National Park Service
- Is not managed under a concessions contract, a recreation activity for which the NPS charges a fee, or a lease

Management Policies also state that unless mandated by statute, the National Park Service will *not* allow visitors to conduct activities that:

- Would impair park resources or values
- Create an unsafe or unhealthy environment for other visitors or employees
- Are contrary to the purposes for which the park was established
- Unreasonably interfere with the atmosphere of peace and tranquility, or the natural soundscape maintained in wilderness and natural, historic, or commemorative locations within the park
- Would disrupt NPS interpretive, visitor service, administrative, or other activities
- Impede NPS concessioner or contractor operations or services
- Interfere with other existing, appropriate park uses

# **Cooperating Associations**

Congress authorized cooperating associations in 1946. Their mission is to support park interpretive and scientific activities through proceeds from sales of educational and interpretive materials in a park. They are usually assigned space in a visitor center or other visitor contact facility. Cooperating associations are authorized by a cooperative agreement. They are managed by a service- wide set of criteria and policies found in Director's Order 32: Cooperating Associations.

**Northwest Interpretive Association** supports Mount Rainier National Park's interpretive programs through the sale of educational and interpretive materials in the park. The association is assigned sales areas in visitor centers and museums in Longmire,

Ohanapecosh, Paradise, Sunrise, and Wilkeson. An agreement between the park and the association authorizes and directs how association business will be conducted.

# **Historic Leasing Program**

In 1982 the National Park Service established the Historic Leasing Program to lease historic structures and agricultural land to individuals and organizations. The program was designed to spur rehabilitation and reuse of designated historic structures and federally owned lands. Any proceeds from these leases are to be used to maintain, repair, and preserve historic properties and to defray the costs of administering the program.

Under the 1998 Act, general leasing authority was granted for the use of buildings and associated property administered by the National Park Service. Such leasing authority is not to be used to authorize activities that are subject to authorization under a concessions contract, commercial use authorization, or similar instrument. Regulations were published in the Federal Register on December 27, 2001 (36 CFR Part 51).

At this time, there are no historic leases in Mount Rainier National Park.

#### **Home Businesses**

The National Park Service recognizes that parks are not only places of work, but can also be homes to both federal and concession employees. The National Park Service recognizes the right of resident employees to conduct their personal lives with the same degree of freedom they would have if they lived in private housing outside the parks, provided that such conduct doesn't impair park resources, values, or administration.

Home business of the following nature may be approved:

- Where the product produced is sold outside the park
- Where the goods or services are provided to employees and others living in the park, and there is no door- to- door solicitation
- Where the business is conducted by telephone or mail

Tenants must seek the approval of the superintendent or site manager prior to conducting a business. Director's Orders 36 (Housing Management) and 37 (Home Businesses in the Park) deal with these issues and, at the time of this document, are draft form waiting to be finalized.

# The Commercial Services Staff at Mount Rainier

The Commercial Services staff at Mount Rainier National Park currently consists of one full time and one part time employee. Visitor Services, Resource Protection, Interpretation and Education, Maintenance, Administration, and Natural and Cultural Resource Management staff members provide advice, monitor and manage activities and operations provided by commercial entities. Protection rangers are tasked with enforcing the Code of Federal Regulations and other rules at the park.

The Commercial Services staff at Mount Rainier National Park evaluates concessioner performance, authorizes rates charged by concessioners, conducts inspections, maintains public health oversight, and responds to questions and concerns from the public and from businesses. The Commercial Services staff oversees the preparation and management of concessions contracts, incidental business permits, and commercial use authorizations. The staff serves as the link between commercial operators and the park. Their work also includes implementing provisions of Title IV of the 1998 National Park Service Concessions Management Improvement Act, which provides guidance for managing commercial operations in national parks, and implementing regulations for 36 CFR Part 51.



Sunrise Lodge Staff, 1929 / twc855

# **Public Scoping Issues**

In spring of 2002, the Commercial Services Planning Team facilitated public meetings in Ashford, Tacoma, Yakima, and Seattle, as well as a park staff meeting in Longmire, to gather input about the future of park commercial services. Park staff members were also asked for their comments. The meetings provided a springboard for discussion among planning team members and ultimately helped shape the alternatives.



# **Public Comments on Climbing**

The greatest number of public comments received related to guided climbing services on Mount Rainier. Many people expressed the belief that there should be greater competition among guiding services, although there was no consensus as to how this ought to be achieved. Some suggestions included increasing the number of concessioners and IBP holders. Others wanted to see other routes on the mountain become more accessible for commercial use. A number of people expressed concerns about the presence of large commercially guided groups on the mountain and their effect on other users.

Generally speaking, the participants did not want the number of commercial users to increase on the mountain. They felt that any new commercial services plan should continue to maintain a balance of guided and non-guided climbers. Several people suggested commercial- free time periods and commercial- free zones.

### **Shuttles**

A number of comments were made about park shuttles, but there was no consensus. Suggestions ranged from creating scheduled services that would ultimately replace private vehicles to keeping shuttle services simple. Several people supported a shuttle

service along the closed portion of the Westside Road. A few people raised questions about the need for shuttle services—was it an issue of convenience, overcrowding, air quality, or all three?

### **Limiting Commercial and Non-commercial Users**

A great deal of discussion took place concerning the impact of increased commercial use on independent visitors. Most people who commented did not want to see the number of commercial users increase. They wanted guiding and touring companies to help disperse use by visiting less popular areas of the park, or by visiting on weekdays, or at less busy times of the year.

Many people wanted the park to establish carrying capacities so that visitors, independent and commercially guided, could have a pleasant, quality experience without feeling crowded. Resources could also be protected by carrying capacities, and a great deal of concern was expressed for protecting the park from increased use in general.

#### **New Commercial Activities**

Several public comments were made regarding new commercial activities in the park. Comments ranged from requests that snowplay be made a commercial activity, to suggesting that massage services be introduced at Paradise. Although no particular type of commercial service received repeated requests, there was an underlying concern that there should be a standard process for deciding which kinds of services would be permitted in the park, and that the standard should be clearly articulated.

# **Other Significant Planning Issues**



In addition to issues brought up during the public scoping process, the Commercial Services Planning Team took into account other planning issues, many of which were described in the 2002 General Management Plan. The following are the most relevant to commercial services.

# **Changes to Commercial Services**

- The contract for lodging, food service, gift sales, and ski and snowshoe rental and guided ski trips held by Guest Services, Incorporated (GSI) expires December 31<sup>st</sup>, 2012, and will not be reviewed in this Commercial Services Plan
- Regulations are being reviewed on the national level for the implementation of commercial use authorizations (CUAs), which will replace incidental business permits (IBPs); although the substance of these regulations cannot be fully anticipated, this plan will comply with them when they are finalized
- A moratorium on new IBPs has been in place since 1998, and once the commercial services planning process is complete, it will be lifted; if a "No Action" alternative were selected, an increased number of commercial use authorizations (CUAs) could be issued for each approved category

# **Commercial Service Provider Training**

- Only a small percentage of commercial service employees receive an orientation to the National Park Service mission and an explanation of the important role that they play in protecting park resources
- The GMP calls for increasing both the amount and effectiveness of information provided to visitors
- The park's Interpretive Plan calls for greater sharing of park values with commercial service employees

### **Parking and Traffic**

- On peak summer days vehicle congestion at park entrances, parking areas, and wilderness trailheads continues to adversely affect the quality of visitor experience
- The General Management Plan calls for the expansion of business opportunities for visitor shuttles to help resolve parking problems and congestion, provide visitors with an alternative method of accessing popular areas, decrease air and noise pollution, improve park access, save energy, and simplify travel
- An extensive transportation study called for in the General Management Plan will eventually provide guidance as to how to achieve General Management Plan goals for a more comprehensive shuttle system

# Climbing

- Mount Rainier's terrain and weather conditions offer world- class climbing opportunities that have tested the skills of climbers for more than a century
- More than 10,000 people attempt to climb Mount Rainier's summit each year, at least 1/3 of them seek out professional guides
- The contract for guide services currently held by Rainier Mountaineering, Incorporated (RMI) was to expire in 2001. It is currently on the second one- year extension, pending the development of a new concession prospectus.

#### Wilderness Use

- In some areas, large numbers of people visiting the wilderness are degrading and damaging park resources
- Public views differ on what visitor experiences are appropriate in Mount Rainier Wilderness
- The Wilderness Management Plan, which identifies the standards for the limits of acceptable change in wilderness areas, sets use limits, and takes other actions based on these standards, is scheduled for revision
- The GMP calls for visitor carrying capacity studies to measure the type and level of visitor use that can be accommodated while sustaining desired resource and visitor experience conditions

### **Guided Wilderness Use and Guided Alpine Wilderness Use**

- Public demand for backcountry sites is high
- The park's backcountry is generally filled to capacity during peak periods
- There are limited opportunities for certain kinds of non-summit guided experiences in the alpine wilderness, such as search and rescue training

## **Commercially Guided Day Use Activities**

- Visitors are concentrated in a few areas of the park, such as Paradise and Sunrise
- Off- trail use in these areas results in the trampling of sensitive vegetation
- The GMP calls for dispersing visitors away from heavily used front- country areas
- Mount Rainier National Park is an appropriate place to learn about natural and cultural resources
- Very few commercial day use activities are offered at Mount Rainier, and most of them are snow and ice related courses connected with summit attempts
- Commercial travel tours without Day Use CUAs can enter the park by paying commercial vehicle fees, but they cannot then guide their clients on trails
- These commercial travel tour groups go unguided outside of the vehicle, increasing the risk for resource damage
- Because of the moratorium, no new Day Use CUAs can be issued, and so commercial travel tour groups cannot apply for CUAs to guide their clients

# **Bicycling**

- Heavy traffic and steep and narrow roads without shoulders make bicycling a potentially dangerous activity
- There are few areas for cars to safely pass bicyclists, which can result in traffic congestion

# **Towing Services**

- Towing services are necessary and appropriate in Mount Rainier National Park, not only for visitor convenience, but for road safety
- Independent travelers want to contract road service companies convenient to them and often seek out companies which have agreements with their road service organization

# **Goals for the Commercial Services Plan**



After considering the wide range of public comments regarding commercial services, as well as current planning issues and management direction, the Commercial Services Planning Team established the following goals for the Commercial Services Plan. The alternatives address these desired future conditions through different management strategies, and ensure the preservation of the park's purposes and values.

#### **General**

- Alternatives should offer visitors more choice both in the number of service providers and in the types of trips offered
- Some commercial- free areas or times should be established
- Commercial use of wilderness should not increase significantly beyond current levels
- Commercial activities should not significantly detract from or lessen the experiences of independent visitors
- Commercial service providers and their clients should be knowledgeable about the National Park Service mission and their own role in protecting park resources
- Opportunities for commercial use should be available year- round

#### **Resource Protection**

- Park resources and values should continue to be protected from unacceptable impacts
- Strategies for mitigating resource impacts should be integrated into the alternatives
- Commercial use of wilderness should not increase significantly beyond current levels
- Commercial use limits should be flexible enough to respond to new impacts and changes in visitor experience and resource protection indicators and standards
- Overnight commercial group size limits in wilderness should be consistent with limits for non- commercial users

#### **Quality Visitor Experiences**

- There should be appropriate opportunities for recreation and enjoyment
- All commercial operators should provide high quality experiences to their clients in compliance with park management guidelines and policies
- All commercial operators should minimize risk to clients, guides, and others through education, training, and safe practices

# **Parking and Traffic Congestion**

- Employees and clients of commercial operators should be shuttled into the park to avoid contributing to existing parking and traffic congestion
- Visitors should have an opportunity to use shuttles to visit a variety of areas within the park

#### **Commercial Use Authorizations**

- CUA holders should be responsible for paying a reasonable fee to cover, at a minimum, management and administrative costs
- As with IBPs, conditions and stipulations should apply to CUAs

# **Guided Climbing**

• The current concessioner guides far fewer clients than the terms of its contract

allows

- Actual overall commercial use of routes should not increase significantly
- Potential commercial use should decrease overall
- Commercial use of the Muir Route should continue
- Commercial use of other routes identified as High Use and Moderate Use Climbing Zones (Emmons and Kautz Routes) should continue
- Overnight commercial use of sensitive areas should be limited or prohibited

### **Guided Wilderness Use**

- The current concessioner guides far fewer clients than the terms of its contract allows; *potential* commercial use should decrease overall
- Actual commercial use should not increase significantly

# **Guided Alpine Wilderness Use**

- The current concessioner guides far fewer clients than the terms of its contract allows
- Actual commercial use should not increase significantly
- Potential commercial use should decrease overall
- Opportunities for non- summit educational seminars, such as alpine search and rescue training should be available
- Activities should be limited to existing authorized areas where it can be easily managed

#### **Additional Commercial Services:**

- There should be a range of appropriate services offered to park visitors
- A fair, consistent, and systematic method of evaluating requests for new commercial services should be created that considers impacts on park resources and values, park operations and visitor use
- Steps should be taken to begin the implementation of the General Management Plan directive for allowing shuttle services on the Westside Road and parkwide
- Specialized towing services should be available for visitors with RVs, motorcycles, and vehicles with other unique requirements, including automobile club memberships

# **Common to All Alternatives**



Photographers outside the Guide House, 1927 / n302

The planning team identified a number of conditions common to all the alternatives. These items reflect existing rules, regulations, and policies that would continue to be in effect no matter which alternatives were selected. What follows is not a complete list, but rather a list of conditions essential to understanding the plan.

#### Common to All: General

- All commercial groups must follow park rules and regulations
- Commercial groups must not access areas off- limits to independent users
- Commercial groups must carry appropriate insurance
- Winter is be defined as October 1 May 14; summer as May 15 September 30
- Winter regulations are in effect when snow levels are at depths prescribed by the Wilderness Management Plan (currently when at least 5 feet of snow is on the ground in the Paradise Day Use Area and at least 2 feet is on the ground elsewhere)

# **Common to All: Guided Climbing**

• Overnight spaces for concessioners will be allotted at the beginning of each climbing season and verified daily

- If a concessioner does not plan to use a portion of its allotment, that portion will be made available to the public
- Clients and guides must be shuttled into the park to help reduce traffic congestion

#### Common to All: Firewood Sales

- The General Management Plan calls for permanent changes to campground facilities, including creating centralized fire pits in each campground, and reevaluating existing ones in order to reduce air pollutant emission sources
- Firewood sales will continue until the GMP is fully implemented
- One concessioner will sell firewood at Cougar Rock and a concessions contract will be issued to sell firewood at Ohanapecosh and White River Campgrounds

#### **Common to All: Commercial Travel Tours**

- Most commercial van and bus tours enter the park by paying commercial entrance fees collected at entrance stations
- Tour guides are only permitted to guide their clients while they are in the vehicle, and not on the trails or at the overlooks
- Approximately 200 different companies use the park, some arriving daily, some weekly, and others at less regular intervals
- Since rules for access to National Parks by commercial tour vehicles are established nationally, they will not be addressed in this plan

# **Common to All: Changes to Commercial Services**

- The concessions contract for lodging, food service, gift sales, ski and snowshoe rental, and guided ski trips held by Guest Services, Incorporated (GSI) expires on December 31, 2012, and will not be affected by this Commercial Services Plan
- The contract for guide services currently held by Rainier Mountaineering, Incorporated (RMI) is currently extended through December 31, 2003, pending the development of a prospectus for a new contract. If a new contract will not be ready for award by this date, the park will take necessary measures to avoid the interruption of services to visitors.
- Changes in guided climbing made by this plan will be implemented in the new climbing prospectus and subsequent contract
- The promulgation of regulations is being reviewed in the Washington Office to implement CUAs, which will replace IBPs

# **Common to All Action Alternatives**

In drafting the alternatives, the planning team identified a number of conditions "common to all the action alternatives," alternatives 2-4 in each commercial service category.



#### **Common to All Action: General**

- All commercial groups, with some exceptions in the category of day use, would have 12 or fewer members, including guides
- Commercial groups would follow Leave No Trace principles and practices
- Commercial groups would use the blue bag system for human waste disposal in winter and/or at high elevations as required
- Commercial service providers would be required to give their employees an orientation to National Park Service mission and values
- Commercial service providers would share information about National Park Service mission and values with their clients
- No groups over 5 clients and guides could use cross- country zones in summer; see alternatives for additional restrictions
- Groups would walk on snow whenever possible in cross- country and alpine areas
- Groups of 12 or fewer could travel and camp in cross- country zones on snow when winter regulations are in effect
- No more than I commercial group could camp in any a cross-country or alpine zone or camp at a time, with the exception of Camps Muir, Hazard, and Schurman
- The Paradise Non- wilderness Area would have a limit of 2 commercial groups per night per zone in winter
- Commercial operators would be responsible for collecting all cost recovery and entrance fees from their clients and forwarding the fees to the park

# **Common to All Action: Client Transportation**

- All commercial service providers would provide in- park shuttle transportation for their employees and clients, with the exception of Step- on Guides (guides hired to accompany visitors on a daily basis through the park)
- No more than 2 vehicles per group could be parked at a trailhead at one time

### **Common to All Action: Guided Climbing**

- There would be a minimum guide- to- client ratio of 1:4 whenever activities occurred on glaciers or above 10,000 feet
- Mountaineering Day Schools could occur in designated areas within the Paradise Non- wilderness Area
- Mountaineering Day Schools would have a minimum guide- to- client ratio of 1:11
- Commercial groups would access routes only via standard approach routes, of which there are approximately 39
- "Other routes" would be defined as standard approach routes other than Muir, Emmons, and Kautz
- Concessioner groups would access the Kautz Route and Fuhrer's Finger via Paradise rather than Van Trump Park
- Due to increasing environmental impacts, there would be no commercial camping on the Muir Snowfield (the 12 spaces previously used by commercial groups would be eliminated and the public would continue to have access to the 24 spaces they now use. Increased monitoring of the area and possible amendments to the Wilderness Management Plan would be considered to further mitigate impacts)
- Groups would not be permitted to camp below 10,500 feet at either Alpine Nisqually or Alpine Winthrop, except for mountain circumnavigations
- The park may require a certain percentage of use to occur when winter regulations are in effect

#### **Common to All Action: Guided Wilderness**

- Groups would have a minimum guide- to- client ratio of 1:5
- Groups with 5 or fewer members would camp in individual campsites; groups of 6 or more would camp in group campsites
- Groups on the Wonderland Trail would camp in designated trailside camps in summer and could not travel cross- country
- Groups on the Wonderland Trail could not occupy a camp for more than I night
- There will be no commercial use of Indian Bar or Summerland camps on Friday or Saturday nights

# **Common to All Action: Guided Alpine Wilderness**

- There would be a minimum guide- to- client ratio of 1:4
- All trips would require climbing permits

- Camps Muir, Schurman and Hazard would not be available to Alpine Wilderness Use CUA holders
- All camping would take place on snow and ice
- Groups traveling and camping cross- country must use previously impacted sites if present
- There would be no more than I commercial group per wilderness management area
- Guided Alpine Wilderness activities would occur between 8,000-10,500 feet
- Appropriate activities would include search and rescue training, snow and ice schools, and other alpine- related courses

#### Common to All Action: Commercial Service Providers

- Where reservations for backcountry campsites are required, spaces would be reserved in advance of the opening of the public reservation system; spaces requested after the opening would be reserved in competition with the public
- Where reservations for drive- in campgrounds are required, spaces would be reserved through the reservation system in competition with the public
- Concessioners could compete for CUAs, and CUA holder could compete for concessions contracts
- Approved activities, if found to be incompatible with resource protection, visitor enjoyment, and/or visitor safety, may be suspended or terminated

# **Guided Climbing Alternatives**

The Commercial Service Plan describes four alternatives for the management of guided climbing on Mount Rainier. Reporting methods varied for 2001 statistics; they should be considered approximate.

Guided Climbing Alternatives Compared (Table 2)			
Alternative 1	Alternative 2	Alternative 3 Preferred	Alternative 4
1 Concessioner	1 Concessioner	<b>3 Concessioners</b> guide	1 Concessioner guides
guides Muir, Kautz, and other routes	guides the Muir Route	Muir, Emmons, Kautz, and other routes	Muir and other routes
	4 Concessioners		<b>1 Concessioner</b> guides
An increased number of CUAs	guide Emmons, Kautz and other routes	18 Single Trip CUAs	Emmons, Kautz, and other routes
guide Emmons (Currently 4 IBPs)			18 Single Trip CUAs
	Rout	e Restrictions	
Emmons:	<b>Emmons and Kautz:</b>	Emmons and Kautz:	Kautz and other routes:
No Friday or	No Friday and	No Friday or Saturday	No Friday or Saturday
Saturday night stays	Saturday night stays	night stays	night stays
		Commercial-free areas: Liberty Ridge, Sunset Ridge and Amphitheater, Tahoma Glacier, South Mowich Glacier	Commercial-free areas: Liberty Ridge, Sunset Amphitheater, and Tahoma Glacier
	Annual Use Li	mits (Clients & Guides)	
Muir: 8260+ (summer)	Muir: 4000	Muir: 4000 (1333 each)	Muir: 3000
(2001=4145)	<b>Emmons: 480</b> (120 each)	<b>Emmons: 480</b> (160 each)	Emmons: 560
Emmons: 192		Kautz: 480 (160 each)	Kautz: 240
(2001=192)	<b>Kautz: 480</b> (120 each)	<b>Other: 300</b> (100 each)	<b>Other: 200</b> (100 each)
Kautz and other:			
Limited only by camp availability (2001=99)	<b>Other: 400</b> (100 each)	Single Trip Guides: 90	Single Trip Guides: 90
Total: 8452+	Total: 5360	Total: 5350	Total: 4090

# Guided Climbing Alternative 1 (No Action)

- One concessioner guides Muir, Kautz and other routes
- An increased number of CUAs could guide on the Emmons

Guided Climbing Alternative I describes the way guided climbing is now managed and how it would be managed if none of the action alternatives were selected and the moratorium on IBPs/CUAs were lifted.

It is important to note that there is a difference between the way commercial services are currently managed and the way they *would* be managed in the future if no action were taken. After the completion of the commercial services planning process, the moratorium on IBPs/CUAs would be lifted and commercial use could expand dramatically. Limits on those services would come only from existing Wilderness Management Plan overnight use limits. Changes to commercial services management regulations would also affect this alternative. See "Commercial Services at Mount Rainier" for more information.

### **Current Management**

Guided climbing is now managed through one concessioner and four IBP holders. The concessioner is assigned 59 overnight spaces for clients and guides on the Muir Route. Although it is not pre- assigned any spaces for other routes, the concessioner may use the public reservation system and reserve additional spaces (if available) in other locations, except the Emmons Route (Emmons Glacier via Camp Schurman).

Four IBP holders guide exclusively on the Emmons. They are each permitted to guide four groups of 12 clients and guides per year, and must stagger their starting dates. They may not guide on any other routes, nor may they guide on weekends.

In 2001, the concessioner led 4,145 climbers on the Muir Route, and another 99 climbers on other routes. These totals are far below what the concessioner was *authorized* to lead. Four IBP holders led 192 climbers on the Emmons Route.

# **Future Management after the Moratorium is Lifted**

### One concessioner could operate a guiding service and:

- Guide up to 59 people per night on the Muir Route
- Access the Muir Route 7 days a week

- Reserve and use up to 35 spaces per day at Camp Muir, 12 spaces on the Muir Snowfield and up to 12 spaces at Ingraham Flats
- Obtain additional spaces on all other established routes (except the Emmons) using the public reservation system
- Have a minimum guide- to- client ratio of 1:4 on the Muir Route and a minimum of 1:3 on all other expeditions
- Use up to 36 spaces per day for Mountaineering Day Schools, which teach clients mountaineering skills, usually as part of an upcoming summit attempt
- Have a minimum guide- to- client ratio of 1:11 during Mountaineering Day Schools

### An increased number of CUAs could guide on the Emmons route and:

- The number of trips each CUA could guide would be limited by camp availability and limits established by the Wilderness Management Plan
- Each CUA holder would be required to have 12 or fewer members per group with a minimum guide- to- client ratio of 1:3
- Climbs would be limited to 3 nights
- No Mountaineering Day School slots would be available for CUAs—all training would be done on route, outside the park, or through the Muir Route concessioner
- CUA holders would continue to stagger starting dates to avoid most overlap
- Friday and Saturday nights would be commercial-free on the Emmons

	Guided Climbing Alternative 1 (Table 3)		
Authorizations	Trip Options	Current Limits (Clients & Guides)	Future Limits (Clients & Guides)
1 Concessioner: Muir Route	Daily UseCamp at Camp Muir,Ingraham Flats &Muir Snowfield	59 per day 8260 per summer	Same as current limits
		(actual use in 2001 was 4,145)	
		Additional spaces limited only by camp availability	
Other Routes	Daily use All routes but Emmons	Limited only by camp availability	Same as current limits
		(actual use in 2001 was 99)	
Mountaineering Day School	No area limitation	36 spaces per day	Same as current limits
IBP / CUA Holders: Emmons Route	No Friday or Saturday night stays	4 IBP holders 192 per summer	Moratorium Lifted
	3-night climbs	(actual use in 2001 was 192)	Increased number of CUAs holders
Mountaineering Day School		No spaces allotted	Number of trips, clients, and guides limited by camp availability

# **Guided Climbing Alternative 2**

- One concessioner guides Muir
- Four concessioners guide Emmons, Kautz, and other routes

In Guided Climbing Alternative 2, guided climbing would be managed through one concessioner on the Muir Route and four concessioners on the Emmons, Kautz, and other routes. This management strategy is similar to that of Guided Climbing Alternative I, in that only one concessioner would guide on Muir. But instead of managing other guide services through four IBPs, it authorizes four concessions contracts, and expands the routes on which they can guide.

Maximum limits on Muir would be decreased, and the four concessioners on the Emmons, Kautz, and other routes could lead a greater number of trips on a greater variety of routes than the current IBPs in Guided Climbing Alternative I.

#### One concessioner on the Muir Route would:

- Take an annual limit of 4000 clients and guides on this route
- Guide a limit of 36 clients and guides per night
- Divide into groups of no more than 12 each and stagger starts to avoid congestion
- Camp at Camp Muir or Ingraham Flats with no more than 12 clients and guides at Ingraham Flats
- Have 24 spaces per day for a Mountaineering Day School (MDS) in the Paradise Non- wilderness Area

#### The four concessioners would, on the Emmons:

- Each take an annual limit of 120 clients and guides (total of 480)
- Each guide up to I group of no more than 12 clients and guides every other week
- Stagger starting dates to minimize overlap
- Camp up to 1 night each at Glacier Basin and Inter Glacier, and up to 2 nights at Camp Schurman or Emmons Flats
- Not camp on route Friday or Saturday nights
- Not be allocated an area on the Emmons for Mountaineering Day Schools; would train clients on route, outside of the park, or through Muir-based schools

### The same four concessioners would, on the Kautz:

- Each take an annual limit of 120 clients and guides on this route (total of 480)
- Each guide up to I group of no more than 12 clients and guides every other week
- Stagger starting dates to minimize overlap
- Not camp on route Friday or Saturday nights

• Not be allocated an area on the Kautz for Mountaineering Day Schools; would train clients on route, outside of the park, or through Muir-based schools

# The same four concessioners would, on other routes:

- Each take an annual limit of 100 clients and guides on other routes (400 total)
- Each guide one group of no more than 5 clients and guides per week
- Camp on route any night of the week

Guided Climbing Alternative 2 (Table 4)			
Concessioners	Trip Options	Use Limits (Clients & Guides)	
1 Concessioner: Muir Route	Daily use; Camp at Camp Muir & Ingraham Flats	3 groups of 12 per day; 36 total per day; Annual limit of 4000	
Mountaineering Day Schools	Paradise Non-Wilderness Area	24 spaces per day	
4 Concessioners: Emmons Route	No Friday and Saturday night stays Stagger starting dates	2 group of 12 each every other week; 24 total per week Annual limit of 120 each; 480 total	
Kautz Route	No Friday and Saturday night stays Stagger starting dates	2 groups of 12 each every other week; 24 total per week Annual limit of 120; 480 total	
Other Routes	Daily use	1 group of 5 each week; 20 total Annual limit of 100; 400 total	
Mountaineering Day Schools	No spaces allotted		

# **Guided Climbing Alternative 3** *Preferred*

# • Three concessioners guide Muir, Emmons, Kautz, and selected routes

In this Guide Climbing Alternative (the preferred), selected climbing routes would be available for commercial use through three equal concessioners, who would each guide the same limit of trips annually. Competition would be maximized.

In comparison to Guided Climbing Alternatives 1 and 2, a greater variety of trip lengths could be offered due to less group overlap. Fewer routes would be available for commercial use during the summer, as Liberty Ridge, Sunset Amphitheater, Sunset Ridge (including Puyallup Glacier), Tahoma Glacier, and South Mowich Glacier would be reserved for independent users. Access to Ptarmigan Ridge and Mowich Face would only be via Mowich Lake. Additionally, there would be commercial- free times, with no Friday and Saturday night stays on the Emmons and Kautz Routes.

Eighteen commercial use authorizations (CUAs) would be available through "Single Trip Guides" allowing one- time commercial trips with certified guides not connected with the three concessioners. Alternative 3 creates an opportunity for clients to train privately on the mountain with nationally and internationally recognized guides.

#### On the Muir Route, 3 concessioners would:

- Each take an annual limit of 1,333 clients and guides on this route (total 4000)
- Each guide up to 1 group of no more than 12 clients and guides per night
- Camp at Camp Muir any night of the week
- Each have 12 spaces per day for Mountaineering Day Schools (MDS) in the Paradise Non- wilderness Area

#### On the Emmons Route, 3 concessioners would:

- Each take an annual limit of 160 clients and guides on this route (total of 480)
- Each guide up to 2 groups of no more than 12 clients and guides each every third week
- Stagger starting dates between the 2 groups to minimize overlap
- Camp at Glacier Basin, Inter Glacier, Camp Schurman, and Emmons Flats (maximum one group per camp per night)
- Not camp on route Friday or Saturday nights
- Not be allocated an area on the Emmons for Mountaineering Day Schools; would train clients on route, outside of the park, or through Muir-based schools

#### On the Kautz Route, 3 concessioners would:

- Each take an annual limit of 160 clients and guides on this route (total of 480)
- Each guide up to 2 groups no more than 12 clients and guides each every third week
- Stagger starting dates to minimize overlap
- Not camp on route Friday or Saturday nights
- Not be allocated an area on the Kautz for Mountaineering Day Schools; could train clients on route, outside the park, or through Muir- based schools within established limits

#### On other routes, 3 concessioners would:

- Each take an annual limit of 100 clients and guides (total of 300)
- Each guide up to I group of no more than 5 clients and guides per week
- Guide up to 7 days a week
- Be restricted from climbing Liberty Ridge, Sunset Amphitheater, Sunset Ridge (including Puyallup Glacier), Tahoma Glacier, and South Mowich Glacier in the summer

### Single Trip Guide CUAs

Mount Rainier is widely recognized as one of the best places in North America to train for longer and more difficult climbs in Alaska and abroad. The purpose of Single Trip Guide CUAs would be to enable national and international climbing guides to bring their clients to Mount Rainier for a one- time trip.

18 Single Trip Guide CUAs would be granted, subject to the following conditions:

- Each CUA holder could guide I group of no more than 5 clients and guides
- Trips could be up to 6 nights
- In summer, Single Trip Guides may use any route except Muir, Emmons, Liberty Ridge, Sunset Amphitheater, Sunset Ridge (including Puyallup Glacier), Tahoma Glacier, and South Mowich Glacier
- In summer, Single Trip Guides may use the Kautz Route with no Friday or Saturday night stays
- In winter, Single Trip Guides may use any route; they may use the Muir and Emmons Routes with no Friday or Saturday night stays
- Single Trip Guides could not camp below 10,500 feet in the Alpine Nisqually or Alpine Winthrop areas
- Single Trip Guides must not be employed by a climbing concessioner at the time of their trip and must have:
  - I. American Mountain Guide Association (AMGA) or equivalent certification
  - 2. Wilderness First Responder or equivalent certification

	Guided Climbing Alternative 3 Preferred (Table 5)			
Authorizations	Trip Options	Use Limits (Clients & Guides)		
3 Concessioners: Muir Route	Daily use Camp at Camp Muir only	1 group of 12 per night each 36 total per night Annual limit of 1333 each 4000 total for all 3 concessioners		
Emmons Route	No Friday or Saturday night stays Camp at Glacier Basin, Inter Glacier, Schurman, and Emmons Flats Stagger start dates	2 groups of 12 each every 3 <sup>rd</sup> week 24 total per week Annual limit of 160 each; 480 total		
Kautz Route	No Friday or Saturday night stays Via Paradise Only (not Van Trump) Stagger start dates	2 groups of 12 each every 3 <sup>rd</sup> week 24 total Annual limit of 160 each; 480 total		
Other Routes	Daily use Commercial-free in summer: Liberty Ridge, Sunset Amphitheater, Sunset Ridge, Tahoma Glacier, and South Mowich Glacier	1 group of 12 per week; 15 total Annual limit of 100 each; 300 total		
Mountaineering Day Schools	Paradise Non-Wilderness Area	12 spaces each per day; 36 total		
18 CUAs: Single Trip Guides	Camp up to 6-nights Restrictions vary depending on route and season	1 group of 5 each Annual limit of 90		

# **Guided Climbing Alternative 4**

- One concessioner guides on Muir and other routes
- One concessioner guides on Emmons, Kautz, and other routes

In Climbing Alternative 4, two concessioners would guide on the mountain; one on the Muir and other routes and one on the Emmons, Kautz, and other routes. In summer, Tahoma Glacier, Sunset Amphitheater, and Liberty Ridge would be commercial- free. Commercial groups could access Sunset Ridge, including the Puyallup Glacier below 9,000 feet and South Mowich Glacier. All routes except Muir and Emmons would be commercial- free on Friday and Saturday nights.

Just as in Climbing Alternative 3, eighteen commercial use authorizations (CUAs) would be available through "Single Trip Guides" allowing one- time commercial trips with certified guides not connected with the three concessioners. Alternative 4 creates an opportunity for clients to train privately on the mountain with nationally and internationally recognized guides.

#### On the Muir Route, the Muir Concessioner would:

- Take an annual limit of 3000 clients and guides on this route
- Guide a limit of 24 clients and guides per night, 7 days a week
- Divide into groups of no more than 12 and stagger starts to avoid congestion
- Camp at Camp Muir or Ingraham Flats with no more than 12 clients and guides at Ingraham Flats
- Have 24 spaces per day for a Mountaineering Day School in the Paradise Nonwilderness Area

#### On other routes, the Muir Concessioner would:

- Take an annual limit of 100 clients and guides on other routes
- Guide up to 2 groups of no more than 5 clients and guides each per week
- Not climb via Liberty Ridge, Sunset Amphitheater or Tahoma Glacier in summer
- Not camp on route Friday or Saturday nights

#### On the Emmons Route, the Emmons/Kautz Concessioner would:

- Take an annual limit of 560 clients and guides on this route
- Guide up to I group of no more than 12 clients and guides per night
- Camp at Inter Glacier, Camp Schurman and Emmons Flats
- Have 12 spaces per day for Mountaineering Day School in the Paradise Nonwilderness area

#### On the Kautz Route, the Emmons/Kautz Concessioner would:

- Take an annual limit of 240 clients and guides on this route
- Guide up to I group of no more than 12 clients and guides per night
- Not camp on route Friday or Saturday nights
- Not be allocated an area on the Kautz for Mountaineering Day Schools

#### On other routes, the Emmons/Kautz Concessioner could:

- Take an annual limit of 100 clients and guides on other routes
- Guide up to 2 groups of no more than 5 clients and guides per week
- Not use Sunset Amphitheater, Tahoma Glacier, or Liberty Ridge in summer
- Not camp on route Friday or Saturday nights

#### Single Trip Guide CUAs

Mount Rainier is widely recognized as one of the best places in North America to train for longer and more difficult climbs in Alaska and abroad. The purpose of Single Trip Guide CUAs would be to enable national and international climbing guides to bring their clients to Mount Rainier on an infrequent basis.

18 Single Trip Guide CUAs would be granted, subject to the following conditions:

- Each CUA holder could guide I group of no more than 5 clients and guides
- Trips could be up to 6 nights
- In summer, Single Trip Guides may use any route except Muir, Emmons, Sunset Amphitheater, Tahoma Glacier, or Liberty Ridge in summer
- In summer, Single Trip Guides may use the Kautz Route with no Friday or Saturday night stays
- In winter, Single Trip Guides may use any route including Muir and Emmons Routes with no Friday or Saturday night stays
- Single Trip Guides could not camp below 10,500 feet in the Alpine Nisqually or Alpine Winthrop areas
- Single Trip Guides must not be employed by a climbing concessioner at the time of their trip and must have:
  - I. American Mountain Guide Association (AMGA) or equivalent certification
  - 2. Wilderness First Responder or equivalent certification

Guided Climbing Alternative 4 (Table 6)			
Authorizations	Trip Options	Use Limits (Clients & Guides)	
Concessioner 1: Muir Route	Daily use Camp at Camp Muir & Ingraham Flats	2 groups of 12 per night Annual limit of 3000	
Other Routes	No Friday or Saturday night stays No use of Kautz or Emmons	1 group of 5 per night Annual limit of 100	
	Commercial-free in summer: Sunset Amphitheater, Tahoma Glacier and Liberty Ridge		
Mountaineering Day Schools	Paradise Non-Wilderness Area	24 spaces per day	
Concessioner 2: Emmons Route	Daily use Camp at Inter Glacier, Camp Schurman, and Emmons Flats	1 group of 12 per night Annual limit of 560	
Kautz Route	No Friday or Saturday night stays Access via Paradise only	1 group of 12 per night Annual limit of 240	
Other Routes	No Friday or Saturday night stays No use of Muir Commercial-free in summer: Liberty Ridge, Sunset Amphitheater, and Tahoma Glacier	1 group of 5 per night Annual limit of 100	
Mountaineering Day Schools	Paradise Non-Wilderness Area	24 spaces per day	
18 CUAs: Single Trip Guides	Camp up to 6-nights Restrictions vary depending on route and season	1 group of 5 each Annual limit of 90	

# **Guided Wilderness Use Alternatives**

The Commercial Service Plan describes four alternatives for the management of Guided Wilderness Use at Mount Rainier. Reporting methods for 2001 statistics varied; numbers should be considered approximate.

Guided Wilderness Use Alternatives Compared (Table 7)			
Alternative 1	Alternative 2	Alternative 3 Preferred	Alternative 4
1 Concessioner	3 CUA holders	5 CUA holders	2 CUA holders
&	Each guide:	Each guide:	Each guide:
An increased			
number of CUA	5 trips in summer	1 trip in summer	3 trips in summer
holders	1 up to 14-nights	Up to 5 nights	1 up to 14 nights
(Currently 5 IBPs)	4 up to 7-nights	1 trip in winter	2 up to 7 nights
Limited only by camp	6 tring in winter	1 trip in winter Up to 14 nights	2 tring in winter
Limited only by camp availability	6 trips in winter 6 up to 14-nights	op to 14 mgms	3 trips in winter 3 up to 14-nights
avaliability	o up to 14-mgms		
	Trail Res	trictions	
Any trail	Any trail, but limited	Any trail	Any trail, but limited
	Wonderland and		Wonderland and
Cross-country travel	Northern Loop trips	No Friday or Saturday	Northern Loop trips
and camping		night stays	
	No Friday or Saturday		No Friday or Saturday
	nights on the	Cross-country use in	nights on the
	Northern Loop, at Summerland or at	winter	Northern Loop, at
	Summeriand or at Indian Bar		Summerland, or at Indian Bar
	mulan Bar		indian Bar
	Cross-country use in		Cross-country use in
	summer and winter		winter
		(Clients & Guides)	
Limited by camp	Summer: 180	Summer: 60	Summer: 72
availability	(60 each)	(12 each)	(36 each)
(2001: None for	Nati 4 - 065		
concessioner; 38 of a	Winter: 260	Winter: 60	Winter: 72
potential 94 for IBPs)	(72 each)	(12 each)	(36 each)
Total: N/A	Total: 440	Total: 120	Total: 144

# Guided Wilderness Use Alternative 1 (No Action)

- Climbing concessioner guides trips on any trail
- Increased number of CUA holders guide trips on any trail

Guided Wilderness Alternative I describes the way commercial services would be managed if the no action alternative were selected.

It is important to note that there is a difference between the way commercial services are currently managed and the way they *would* be managed in the future if no action were taken. After the completion of the commercial services planning process, the moratorium on IBPs/CUAs would be lifted and commercial use could expand dramatically. Limits on those services would come only from existing Wilderness Management Plan overnight use limits. Changes to commercial services management regulations would also affect this alternative. See "Commercial Services at Mount Rainier" for more information.

### **Current Guided Wilderness Use Management**

At this time, guided wilderness use is managed through the climbing concessioner and five IBP holders. The climbing concessioner may lead trips limited only by camp availability. It is not assigned backcountry campsites in advance and must reserve them in competition with the public through the reservation system.

The five IBP holders may guide a total of eight guided wilderness trips for 94 people. Trips dates and itineraries are pre- set for IBP holders and backcountry campsites are assigned in advance so that IBP holders can successfully advertised them.

In 2001 and 2002, the concessioner advertised six trips, but did not lead any. Of the five IBP holders, three commercial trips took place with a total of 38 people.

### Future management after the moratorium is lifted:

- An increased number of CUAs could be issued
- The number of trips each CUA could guide would be limited by camp availability and limits established by the Wilderness Management Plan

Guided Wilderness Alternative 1 (Table 8)			
Authorizations	Trip Options	Current Use Limits (Clients & Guides)	Future Limits (Clients & Guides)
1 Concessioner	Any trail; cross-country camping permitted	Limited by camp availability (actual use in 2001 was 0)	Limited by camp availability
CUA Holder 1	14-night Wonderland	1 group of 12 annually (actual use in 2001 was 0)	Moratorium Lifted Increased number
CUA Holder 2	14-night Wonderland	1 group of 12 annually (actual use in 2001 was 0)	of CUA holders  Number and
	5-night Northern Loop with cross-country travel to Elysian Fields	1 group of 12 annually (actual use in 2001 was 9)	location of trips, clients and guides limited by camp availability
CUA Holder 3	Four 5-night Northern Loop	4 groups of 12; 48 annually (actual use in 2001 was 26) 1 group of 5 annually	availability
CUA Holder 4	3-night Glacier Basin	(actual use in 2001 was 0)	
CUA Holder 5	3-night Klapatche Park	1 group of 5 annually (actual use in 2001 was 3)	

# **Guided Wilderness Use Alternative 2**

- Three CUA holders each guide five trips in summer & six in winter
- Groups of 5 or fewer can travel and camp in cross-country areas

In this alternative, all trails would be available for commercial use. Guided wilderness would be managed through three CUAs. Each would guide up to six groups in winter and five in summer. Trip dates would be set in advance.

Guided Wilderness Alternative 2 offers the greatest number of trips out of all the action alternatives, the greatest number of 14- day trips, and may result in the greatest diversity of trails for guided visitors to choose from. This is the *only* action alternative that offers summer access to cross- country areas.

#### Summer

- Each CUA holder could guide 5 summer trips
- I trip could be 14- nights long; the others could be up to 7- nights long
- I trip could be on the Wonderland Trail, with no Friday or Saturday night use of Summerland or Indian Bar camps
- Up to 2 trips could be on the Northern Loop Trail with no Friday or Saturday night stays
- Groups of 5 or fewer could travel and camp cross- country, except where prohibited

#### Winter

- Each CUA holder could guide 6 winter trips up to 14 nights
- Groups could travel and camp cross- country

Guided Wilderness Use: Alternative 2 (Table 9)			
CUA Holders	Trip Options	Use Limits (Clients & Guides)	
3 CUA Holders:			
Summer	<ul> <li>1 trip up to 14-nights</li> <li>4 trips up to 7-nights</li> <li>1 trip could be on the Wonderland Trail</li> <li>No Friday or Saturday nights at Summerland or Indian Bar camps</li> <li>Up to 2 trips could be on the Northern Loop</li> <li>No Friday or Saturday night</li> <li>Cross-country travel and camping for groups of no more than 5 clients and guides</li> </ul>	5 groups of 12 each 60 per CUA holder 180 total	
Winter	Six 14-night trips each Cross-country travel and camping OK	6 groups of 12 each 72 total per CUA holder 216 total	

# **Guided Wilderness Use Alternative 3** *Preferred*

# • Five CUA holders each guide one trip in summer and one in winter

In this alternative, all trails are available for commercial use. Guided wilderness is managed through five CUAs. Each of the five CUAs would be permitted to guide one group of 12 or fewer in summer and one in winter. Trip dates would be set in advance.

The vision behind this alternative is to offer the greatest client choice of commercial service providers compared to the other action alternatives. This alternative also allows the least commercial use, thus reserving more backcountry campsites for independent visitors.

#### **Summer**

- Each CUA holder could guide one 5- night trip on any trail
- No Friday or Saturday night stays would be allowed
- No cross- country use would be permitted in summer

#### Winter

- Each CUA holder could guide one 14- night trip
- Groups could travel and camp cross- country

Guided Wilderness Use Alternative 3 Preferred (Table 10)			
<b>CUA Holders</b>	Trip Options	Use Limits (Clients & Guides)	
5 CUA Holders:			
Summer	One 5-night trip on any trail No Friday or Saturday night stays	1 group of 12 each 60 total	
Winter	One 14-night trip on any trail Cross-country travel and camping	1 group of 12 each 60 total	

# **Guided Wilderness Use Alternative 4**

# Two CUA holders each guide 3 trips in summer and 3 in winter

In this alternative, all trails would be available for commercial use. Guided wilderness use would be managed through two CUAs. Each CUA holder could guide six groups of 12 or fewer, three in summer and three in winter. Trip dates would be set in advance.

The vision behind this alternative is to create a balance between the number of users, the number of available trips, and the number of CUA holders. This alternative allow only a small number of CUAs to provide guided climbing services, but allows them to guide a moderate number of trips, with moderate to low use levels that would not significantly affect independent visitors. This alternative would be fairly easy to manage administratively since there are only two commercial service providers.

#### Summer

- Each CUA holder could guide up to 6 trips
- I trip could be up to 14- nights long, and the rest could be up to 7- nights long
- I trip could be on the Wonderland Trail; no use of Indian Bar or Summerland camps on Friday or Saturday nights
- Up to 2 trips could be on the Northern Loop; no Friday or Saturday night stays
- No cross- country use would be permitted in summer

#### Winter

- Each CUA holder could guide up to three 14- night trips
- Cross- country travel and camping would be permitted

Guided Wilderness Use Alternative 4 (Table 11)			
CUA Holders	Trip Options	Use Limits (Clients & Guides)	
2 CUA Holders:			
Summer	One trip up to 14 nights and two trips up to 7-nights  1 trip could be on the Wonderland Trail No Friday or Saturday night stays at Indian Bar or Summerland camps  Up to 2 trips could be on the Northern Loop No Friday or Saturday night stays	3 groups of 12 each 36 per CUA holder 72 total	
Winter	Three 14-night trip each Cross-country travel and camping OK	3 groups of 12 each 36 per CUA holder 72 total	

# **Guided Alpine Wilderness Use Alternatives**

Some overnight commercial use of wilderness occurs in alpine areas. When that use is not connected to a summit attempt, it falls into the category of Guided Alpine Wilderness Use. This category includes ski circumnavigations, search and rescue training, or snow and ice schools. Because Mountaineering Day Schools are usually connected with summit attempts, they are classified under the category of guided climbing.

The Commercial Service Plan includes four alternatives for the management of Guided Alpine Wilderness Use at Mount Rainier. Each alternative is based on a different management strategy. Reporting methods varied for 2001 statistics; they should be considered approximate.

Guided Alpine Wilderness Alternatives Compared (Table 12)				
Alternative 1	Alternative 2 Preferred	Alternative 3	Alternative 4	
1 Concessioner	5 CUA holders	8 CUA holders	10 CUA holders	
An increased number of CUA holders	Each guides 4 trips 4-nights each	Each guides 3 trips 4-nights each	Each guides 2 trips 4-nights each	
	Area	Restrictions		
All areas except Emmons	Alpine Paradise/Alpine Nisqually and Alpine Winthrop  See "Additional Commercial Services" for circumnavigations and Camp Muir trips	Alpine Paradise/Alpine Nisqually and Alpine Winthrop  See "Additional Commercial Services" for circumnavigations and Camp Muir trips	Alpine Paradise/Alpine Nisqually and Alpine Winthrop  See "Additional Commercial Services" for circumnavigations and Camp Muir trips	
	Annual Use Limits (Clients & Guides)			
Limited by camp availability (2001: 48 for the concessioner; 32 total for IBPs)	<b>240 total</b> (48 each)	<b>288 total</b> (36 each)	<b>240 total</b> (24 each)	

# Guided Alpine Wilderness Alternative 1 (No Action)

- Climbing concessioner may guide alpine trips
- Increased number of CUA holders may guide alpine trips

Currently, Guided Alpine Wilderness Use is managed through the climbing concessioner and two IBP holders.

It is important to note that there is a difference between the way commercial services are currently managed and the way they *would* be managed in the future if no action were taken. After the completion of the commercial services planning process, the moratorium on IBPs/CUAs would be lifted and commercial use could expand dramatically. Limits on those services would come only from existing Wilderness Management Plan overnight use limits. Changes to commercial services management regulations would also affect this alternative. See "Commercial Services at Mount Rainier" for more information.

### Future management after the moratorium is lifted:

- The concessioner could obtain backcountry campsites through the public reservation system in competition with the public
- The concessioner could use any available areas except the Emmons Glacier via the Camp Schurman Route
- An increased number of CUAs could be issued
- The number of trips each CUA could guide would be limited by camp availability and limits established by the Wilderness Management Plan

#### Guided Alpine Wilderness Use Alternative 1 (Table 13) **Trip Options Authorizations Current Use Limits Future Use Limits** (Clients & Guides) (Clients & Guides) All areas except 1 Concessioner Limited by camp availability Limited by camp (actual use in 2001 was 48) **Emmons** availability One 6-night and one 24 annually IBP Holder A Moratorium Lifted (actual use in 2001 was 0) 8-night circumnavigation Increased number of **CUA** holders Two 1-night Paradise 24 annually Glacier trips (actual use in 2001 was 0) Number of trips limited by camp Seven 1-night 84 annually availability **IBP Holder B** Winthrop Glacier trips (actual use in 2001 was 32)

# **Guided Alpine Wilderness Use Alternative 2** *Preferred*

# • Five CUA holders each take four trips up to four nights each

The preferred alternative offers the fewest number of CUA holders, but compared to the action alternatives, each CUA holder may take the greatest number of trips.

- 5 CUA holders could each take 4 trips each up to 4 nights each
- Each trip would consist of one group of no more than 12 clients and guides
- Groups could only use Alpine Paradise/ Alpine Nisqually and Alpine Winthrop Areas
- Groups could not use Camps Muir, Schurman or Hazard
- CUAs could be used in summer or winter

Guided Alpine Wilderness Use Alternative 2 Preferred (Table 14)			
CUA Holders	Trip Options	Use Limits (Clients & Guides)	
5 CUA holders	Four 4-night trips each  Use of Alpine Paradise / Alpine Nisqually and Alpine Winthrop  No use of Camps Muir, Schurman, or Hazard	4 groups of 12 each 48 annually per CUA 240 total	

# **Guided Alpine Wilderness Use Alternative 3**

# • Eight CUA holders could each take three trips up to four nights each

This alternative offers a moderate number of CUA holders. Each may guide a moderate number of trips. Maximum commercial use is slightly higher compared to the other action alternatives.

- 8 CUA holders could each take three trips up to 4 nights each
- Each trip would consist of one group of no more than 12 clients and guides
- Groups could use Alpine Paradise/ Alpine Nisqually and Alpine Winthrop Areas
- Groups could not use Camps Muir, Schurman or Hazard
- CUAs could be used in summer or winter

Guided Alpine Wilderness Use Alternative 3 (Table 15)			
CUA Holders	Trip Options	Use Limits (Clients & Guides)	
8 CUA Holders	Three 4-night trips each  Use of Alpine Paradise / Nisqually Zone and Alpine Winthrop Zone  No use of Camps Muir, Schurman, or Hazard	3 groups of 12 each 36 annually for each CUA holder; 288 total	

# **Guided Alpine Wilderness Alternative 4**

# • Ten CUA holders take two trips up to 4 nights each

This alternative offers the greatest number of CUA holders compared to the other action alternatives. Each may guide a limited number of trips.

- 10 CUA holders could take 2 trips up to 4 nights each
- Each trip would consist of one group of no more than 12 clients and guides
- Groups could use Paradise, Alpine Nisqually and Alpine Winthrop Areas only
- Groups could not use Camps Muir, Schurman or Hazard
- CUAs could be used in summer or winter

Guided Alpine Wilderness Use Alternative 4 (Table 16)			
<b>CUA Holders</b>	Trip Options	Use Limits (Clients & Guides)	
10 CUAs	Two 4-night trips  Use of Alpine Paradise / Alpine Nisqually and Alpine Winthrop  No use of Camps Muir, Schurman, or Hazard	2 groups of 12 each 24 annually for each CUA holder; 240 total	

# **Additional Services**

A number of "Additional Services" are considered in this plan that do not fall under the categories of Guided Climbing, Guided Wilderness Use, or Guided Alpine Wilderness Use.

	Additional Services Compare	ed (Table 17)
Activity	Alternative 1: No Action	Alternative 2 Preferred
Day Use	2 Concessioners Increased number of CUA holders (currently 1 IBP holder)	Road Tours: 10 CUA holders Summer Day Hiking: 10 CUA holders Winter Day Activities: Climbing Concessioner(s) Lodging Concessioner 10 CUA holders Westside Bicycling: 5 CUA holders Photography and Art: 5 CUA holders Step-On Guides: 10 CUA holders
Drive-in Campground Use	Increased number of CUA holders (currently 5 IBP holders)	10 CUA holders
Guided Bicycling	Increased number of CUA holders (currently 2 IBP holders)	5 CUA holders
Shuttles	Increased number of CUA holders (currently 2 IBP holders)	10 CUA holders, one of which operates on Westside Road
Towing	Increased number of CUA holders (currently 6 IBP holders)	Increased number of CUAs
Mountain Circumnavigation	Increased number of CUA holders (currently 1 IBP holder)	5 CUA holders
Winter Use of Camp Muir	1 Concessioner (currently no CUA holders)	Climbing concessioner (s) 5 CUA holders

# Additional Services Alternative 1 (No Action)

Currently, Mount Rainier National Park permits Day Use Activities, Drive- In Campground Use, Guided Bicycling, Shuttles, and Towing. Alternative I shows the way those services are now managed, and how they would be managed if no action were taken after the moratorium on IBPs/CUAs were lifted.

It is important to note that there is a difference between the way commercial services are currently managed and the way they *would* be managed in the future if no action were taken. After the completion of the commercial services planning process, the moratorium on IBPs/CUAs would be lifted and commercial use could expand dramatically. Limits on those services would come only from existing Wilderness Management Plan overnight use limits. Changes to commercial services management regulations would also affect this alternative. See "Commercial Services at Mount Rainier" for more information.

# **Day Use Activities**

Day Use Activities are currently managed through two concessioners and one IBP holder. These kinds of activities could include seminars, guided hikes, and ski and snowshoe touring and lessons. They can not involve overnight use.

#### In Alternative 1, the moratorium would be lifted and:

- An increased number of CUAs could be issued
- The climbing concessioner could continue to offer an increased number of I- day activities, including climbing- related seminars and guided hikes
- The lodging and food concessioner could continue to offer an increased number of cross- country ski and snowshoe lessons and trips

# **Commercial Use of Drive-in Campgrounds**

Typically, holders of Commercial Campground IBPs are involved in some other activity in the park. There are currently five IBP holders who use group sites in drive- in campgrounds. Commercial group camping is currently allowed at Cougar Rock, Ipsut Creek, and Ohanapecosh Campgrounds.

#### In Alternative 1, the moratorium would be lifted and:

An increased number of CUAs could be issued

- Sunday through Thursday nights, CUA holders could reserve 2 of 5 group sites in Cougar Rock Campground and 1 at Ohanapecosh
- Friday and Saturday nights, CUA holders could reserve 1 of 5 sites at Cougar Rock Campground
- CUA holders could reserve additional sites in competition with the public as long as they did not exceed the limits above

# **Guided Bicycling**

Two IBP holders lead commercially guided bicycle trips through the park. One IBP holder can lead one trip, and the other can lead two trips.

#### In Alternative 1, the moratorium would be lifted and:

- An increased number of CUAs could be issued
- No Saturday or Sunday use would be permitted
- Groups could be up to 12 people including leaders
- CUA holders could guide groups through the park, beginning at the Nisqually Entrance and exiting through the Stevens Canyon Entrance, or vice versa

# **Shuttle Transportation**

Currently, one IBP holder runs a scheduled shuttle originating at SeaTac Airport going to Ashford, Longmire, and Paradise. This service runs daily in summer and periodically in winter. Another IBP holder runs a reservations- only shuttle throughout the park wherever public access is permitted. This service runs year- round.

### In Alternative 1, the moratorium would be lifted and:

- An increased number of CUAs could be issued
- CUA holders could run scheduled services and/or reservation- based shuttles

# **Towing**

There are currently six IBP holders for towing and car repair. Two of the businesses are AAA approved, but none are AAA contractors. Two operators work out of Enumclaw, one operates out of Packwood, and three operate out of Eatonville, Graham and Tumwater. If the moratorium were lifted, an increased number of CUAs could be issued.

## **Commercial Services Evaluation Process**

Before the 1998 moratorium, businesses wishing to obtain an incidental business permit were required to pay a non- refundable application fee. They were also required to submit copies of their business licenses, insurance certifications, a description of the activity they desired to perform, and a summary of their qualifications. The park evaluated this information and issued an IBP if the activity was approved and the documentation was in order. If no action is taken, an increased number of CUAs could be issued.

# Additional Services Alternative 2 Preferred

The Commercial Service Plan offers an action alternative to the way additional commercial services are now managed. Alternative 2 covers Day Use Activities, Drive- In Campground Use, Guided Bicycling, Shuttles, Towing, Winter Camp Muir Use, and Mountain Circumnavigation. It also describes a plan for how Mount Rainier National Park should handle requests for new commercial services.

# **Day Use Activities**

Because of the moratorium, limited data exists on the potential impacts of commercial day use. The limits specified below should be considered experimental in nature and subject to change. Alternative 2 allows guided day trips in the following areas:

#### **Road Tours**

Road tours are driving tours involving guided experiences outside the vehicle. These experiences could include short, incidental hikes generally no more than one mile (one-way) along any trail.

- 10 CUA holders could each guide I group per day with a maximum limit of 20 groups per summer
- Road tour groups could be up to 15 with a minimum guide- to- client ratio of 1:14

# **Summer Guided Day Hiking**

- 10 CUA holders could each guide I group per day and a maximum of 20 groups per summer
- Groups could be up to 12 with a minimum guide- to- client ratio of 1:5

**Guided Winter Activities** (Skiing, snowshoeing, or other appropriate activities)

- 10 CUA holders could each guide I group per day in the winter season
- Groups could be up to 12 people with a minimum guide- to- client ratio of 1:5
- CUA guided skiing and snowshoeing trips cannot occur within a ¼ mile radius of the developed areas at Paradise, Longmire, or Sunrise

# **Westside Bicycling Tours**

- 5 CUA holders could offer bicycling opportunities along the Westside road, with each CUA holder leading I group per week
- Groups could be up to 12 with a minimum guide- to- client ratio of 1:11

### **Photography and Art Courses**

- 5 CUA holders could each guide I group per week
- Groups using wilderness trails could be up to 12 clients and guides with a minimum guide- to- client ratio of 1:5
- Groups using only non- wilderness trails could be up to 15 with a minimum guideto- client ratio of 1:14

### **Step-On Guides**

Step- on guides would generally offer their services to visitors by "stepping on" to buses, vans, or into clients' vehicles. They are the only CUA holders who would not be required to provide transportation to their clients.

- Io CUA holders could each guide I group per day
- A minimum guide- to- client ratio of 1:14 would be required
- Guides could not lead clients more than I mile beyond a trailhead

# **Commercial Use of Drive-in Campgrounds**

In Alternative 2, up to 10 CUA holders would be permitted to use:

- 2 out of 5 group sites, Sunday through Thursday nights, in Cougar Rock
- I group site, Sunday through Thursday nights, at Ohanapecosh
- I out of 5 group sites, Friday and Saturday nights, at Cougar Rock Campground
- The I group site, Sunday through Thursday nights, at Ipsut Creek on a first-come, first-served basis. *Note that the General Management Plan calls for Ipsut Creek Campground to be closed in the event of a road washout.*

# **Guided Bicycling**

A maximum of five CUAs would be permitted, and each company would be allowed:

- Up to 2 groups per year of up to 12 cyclists
- From June 1 through September 15, road conditions permitting, cycling trips could take place within the park between Tuesday and Thursday
- From September 16 through May 31, road conditions permitting, cycling trips could take place Monday through Friday

### **Shuttles**

Small steps would be taken towards achieving the transportation goals outlined in the 2002 General Management Plan for shuttles that begin and end outside the park:

- Up to 10 CUAs for shuttle services would be allowed
- CUA holders could provide scheduled service and/or non- scheduled, reservation only service anywhere in the park
- I of the 10 CUA holders would also operate on Westside Road

# **Towing**

Since towing is an important service ensuring visitor safety and convenience, Alternative 2 would allow an increased number of CUAs for towing companies:

- Area companies would be encouraged to obtain a CUA
- Administrative fees would be waived
- Towing companies must be licensed to operate in Washington State

# **Mountain Circumnavigation Trips**

- 5 CUAs could guide I circumnavigation group each, up to 14 nights
- Each group could be no more than 12 clients and guides
- Guide- to- client ratio must be at least 1:4
- Circumnavigation trips would take place between 6,000 and 10,500 feet, with no use of Camps Muir, Schurman or Hazard during the summer season

# Winter Camp Muir Use

Although busy in the summer season, Camp Muir is used less frequently in the winter.

- In winter, up to 5 CUAs could take 5 groups of 12 each to Camp Muir
- Stays at Camp Muir could be no more than 6 nights
- Trips can **not** involve a summit experience
- Guide- to- client ratio must be at least 1:4

# **Proposals for New Commercial Services**

Alternative 2 offers a new way of dealing with proposals for New Commercial Services. See "4- Step CUA / IBP Evaluation Process" in the Appendix for a description.

# **Commercial Services Planning Team**

# **Commercial Services Planning Team Members**

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#### References

Mount Rainier National Park General Management Plan (2002)

Mount Rainier National Park Wilderness Management Plan (1992)

National Park Service Management Policies and Directors Orders

Virgin Islands National Park Commercial Services Plan (2000)

Acadia National Park Commercial Services Plan (1999)

1998 Park Service Concessions Management Improvement Act (PL 105-391)

36 CFR

# Special Thanks To . . .

All those who shared their thoughts and ideas during the public scoping process

# **Appendix: 4-Step CUA / IBP Evaluation Process**

Mount Rainier National Park will use a four–step process to review and analyze proposals for activities that would require new or expanded commercial use authorizations (CUAs), soon to replace incidental business permits (IBPs). The Commercial Services Planning Team designed these procedures to provide a consistent and fair evaluation of all requests. Primary consideration will be given to the potential effect of the proposed activities on park resources and non- commercial visitor activities.

# Which Activities Require the 4-Step IBP/CUA Evaluation Process?

If an applicant wants an authorization for a new kind of IBP/CUA activity, or wants to make significant changes to a previously approved IBP/CUA activity, or if some aspects of a new activity have not been evaluated before, the four- step review will be necessary. Some additional review may also be required, including compliance procedures outlined in the National Environmental Policy Act and NPS Director's Orders 12.

# Which Activities *Don't* Require the 4-Step Evaluation Process?

# Appropriate IBP/CUA Activities

Guided Day Hiking
Photography Walks
Bike Tours
Guided Backpacking
Road-based Tours
Shuttle Services
Educational Experiences
Step-On Guides
Mountaineering Training
Mountain Guides
Guided Ski/Snowshoe Touring
Towing Services

Applicants seeking IBPs/CUAs for activities already approved through this plan (see box) do **not** need to go through this evaluation process as long as the activity will be occurring in a manner previously approved by the park, including level of use, location, number of clients and guides, etc.

If the proposed activity is determined to be a **special park use** (commercial filming, non-commercial group activities, etc.), Mount Rainier National Park will forward a special use permit application to the applicant. Except for IBPs/CUAs, the review of special park use activities is outside of the scope of this plan.

If the proposed activity is determined to be a concession contract, the review process will be accomplished according to the regulatory process at 36 CFR Part 51.

## The Four-step Evaluation Process

Applicants must apply for a CUA/IBP in writing to the park. The applicant must include the administrative fee with the application. The estimated fee for applications is projected to be \$250.00 at the time that this plan is implemented and will be adjusted to allow for current cost recovery of the park's staff time. The application fee is non-refundable. Other fees may apply as noted in subsequent paragraphs below. After a completed application is received, the following steps will be followed.

### **Step 1: Initial Screening**

A park management interdisciplinary team will review every written proposal and determine whether or not the four- step process is required. Next, they will determine which kind of authorization is most appropriate. Is the new activity a potential IBP/CUA, or a concession? If the activity is determined to be more appropriately reviewed as a concessions operation, an evaluation will be made through the provisions listed under the concessions regulation (36 CFR 51) rather than through this four step process.

### **Step 2: Evaluation**

An evaluation form will be used to apply legal standards, recreation potential, resource impacts, effect on management, and other factors derived from the park purpose, significance, and desired future conditions.

If an environmental analysis is required to complete the evaluation, costs for compliance with the National Environmental Policy Act (NEPA) could be borne by the applicant. Cost could include surveys, specialist staff time, contractors, and administrative work. The amount would depend on the complexity of the proposal, and could range from minimal to well over \$40,000.

All proposed new commercial activities reviewed through this process must provide appropriate visitor services that:

- Cannot be adequately met outside the park boundary
- Do not include capital improvements within the park boundary
- Create no unacceptable impacts on natural, cultural and aesthetic resources or park values
- Create no unacceptable impacts on visitor experience, such as increasing use in crowded or congested areas
- Incorporate measures to ensure safe visitor experiences
- Include an educational component appropriate to the activity
- Provide and document staff training for quality educational services
- Comply with applicable federal, state and local laws, rules, codes and regulations
- Comply with Mount Rainier National Park policies as outlined in management documents such as the General Management Plan, Strategic Plan, Commercial

Services Plan, Resource Management Plan, Wilderness Management Plan, and other plans or studies that currently exist or that might exist in the future

#### 3. Decision

The park's superintendent will make the final decision as to whether or not the activity should be authorized, based on the evaluation process. Due to the complexities of some proposal and the limited amount of staff time that can be dedicated to the review process, an application for a new or expanded IBP/CUA service could require a year to review depending on the level of potential impact.

### 4. Applicant Notification

For IBP/CUA applicants, an acceptance letter and completed permit would be sent to applicant for signature if the activity is approved. The permit must be signed and returned to the park and the applicant must submit all required documentation, provide proof of liability insurance with the National Park Service listed as an additional insured party (or the insurance carrier may waive the right of subrogation against the United States Government), and remit any additional required fees (monitoring fees). Only after the superintendent signs the permit is the activity authorized. Commercial service staff would also send applicants written notification if they are denied permits, and would explain why the application was denied. Fees for reviewing a proposal would not be returned.

### **Additional Considerations**

#### **Land Requirements**

IBPs/CUAs do not usually authorize land or facility assignments. IBPs/CUAs do not provide an authority to construct facilities or improvements on federally owned land. Use of park land and facilities for commercial activities are typically authorized by concession contracts and special use permits. If facilities are needed for the business to operate, the proposal will be reviewed through the concessions process.

### **Support Facilities / Services**

Many commercial activities require support facilities and/or services, such as parking spaces, restrooms, changing rooms, and picnic areas. Such support activities have an impact on park budgets, staff, independent visitors, and facilities. When the demand for commercial services exceeds the supply of support facilities and services, park management may either request a modification of the activity, or deny the proposed commercial activity.

#### **Staffing Needs**

The process of monitoring individual commercial use authorizations and concession contracts will be examined to determine National Park Service staff requirements. The amount of staff time required is often dictated by the complexity of the operation and the potential impact on resources. To assess the amount of staff time for processing an application, for the evaluation and approval process, and subsequent authorization and monitoring requirements, the following definitions of complexity will apply:

High – Successful monitoring of the activity will include administrative review annually, permit compliance reviews and onsite contact, whenever possible, with the operation when the activities are occurring.

**Medium** – Successful monitoring of the activity will include administrative review annually, permit compliance and onsite contact with the operation intermittently.

Low – Successful monitoring will include administrative review annually, permit compliance and an onsite review of the areas utilized for the activity. Contact with IBP/CUAs holders may or may not occur during scheduled activities.

Commercial operators, at a minimum, will bear the expense of management and administrative costs for these activities. Costs to IBP/CUA holders could range between \$250.00 (minimum application/administrative charge) to several thousand dollars (application/administrative and management/monitoring costs) for activities with a higher potential for impacts. A list of administrative and management fees will be developed annually for each activity once the plan is implemented.

#### **Other Issues**

Local situations and conditions that are not anticipated will be identified on a case- bycase basis. These issues might include the effects of proposed activities on neighboring communities, agencies, organizations, individuals and park partners. They might also include unforeseen and adverse cumulative effects caused by new commercial services along with already approved ones.